

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

JOYCE TWEEDT HAWLEY AKA
JOYCE HAWLEY COOK
1137 Vantage Place
Fallbrook, CA 92028

Registered Nurse License No. 523140

Respondent

Case No. 2007-304

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on March 21, 2008

IT IS SO ORDERED February 21, 2008



President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 EDMUND G. BROWN JR., Attorney General
of the State of California

2 JAMES LEDAKIS

Supervising Deputy Attorney General

3 RITA M. LANE, State Bar No. 171352

Deputy Attorney General

4 California Department of Justice

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9 Attorneys for Complainant

10 **BEFORE THE**
11 **BOARD OF REGISTERED NURSING**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

Case No. 2007-304

14 JOYCE TWEEDT HAWLEY AKA JOYCE
HAWLEY COOK

15 1137 Vantage Place

16 Fallbrook, CA 92028

17 Registered Nurse License No. 523140

18 Respondent.

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
20 above-entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Ruth Ann Terry, M.P.H, R.N (Complainant) is the Executive Officer of
23 the Board of Registered Nursing. She brought this action solely in her official capacity and is
24 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
25 by Rita M. Lane, Deputy Attorney General.

26 2. Respondent Joyce Tweedt Hawley aka Joyce Hawley Cook (Respondent)
27 is represented in this proceeding by attorney Marc R. Greenberg, whose address is 400 Ocean
28 Gate, P.O. Box 1730, Long Beach, CA 90801-1730.

3. On or about July 3, 1996, the Board of Registered Nursing issued Registered Nurse License No. 523140 to Respondent. The License was in full force and effect at all times relevant to the charges brought in Accusation No. 2007-304 and will expire on November 30, 2007, unless renewed.

JURISDICTION

4. Accusation No. 2007-304 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on June 27, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2007-304 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, discussed with counsel, and fully understands the charges and allegations in Accusation No. 2007-304. Respondent has also carefully read, discussed with counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2007-304.

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1 9. Respondent agrees that her Registered Nurse License is subject to
2 discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the
3 Disciplinary Order below.

4 CONTINGENCY

5 10. This stipulation shall be subject to approval by the Board of Registered
6 Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the
7 Board of Registered Nursing may communicate directly with the Board regarding this stipulation
8 and settlement, without notice to or participation by Respondent or her counsel. By signing the
9 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
10 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
11 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
12 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
13 action between the parties, and the Board shall not be disqualified from further action by having
14 considered this matter.

15 OTHER MATTERS

16 11. The parties understand and agree that facsimile copies of this Stipulated
17 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
18 force and effect as the originals.

19 DISCIPLINARY ORDER

20 In consideration of the foregoing admissions and stipulations, the parties agree
21 that the Board may, without further notice or formal proceeding, issue and enter the following
22 Disciplinary Order:

23 IT IS HEREBY ORDERED that Registered Nurse License No. 523140 issued to
24 Respondent Joyce Tweedt Hawley aka Joyce Hawley Cook (Respondent) is revoked. However,
25 the revocation is stayed and Respondent is placed on probation for three (3) years on the
26 following terms and conditions.

27 **Severability Clause.** Each condition of probation contained herein is a separate
28 and distinct condition. If any condition of this Order, or any application thereof, is declared

unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully restored.

3. **Report in Person.** Respondent, during the period of probation, shall appear in person at interviews/meetings as directed by the Board or its designated representatives.

4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or practice as a registered nurse outside of California shall not apply toward a reduction of this probation time period. Respondent's probation is tolled, if and when she resides outside of California. Respondent must provide written notice to the Board within 15 days of any change

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1 of residency or practice outside the state, and within 30 days prior to re-establishing residency or
2 returning to practice in this state.

3 Respondent shall provide a list of all states and territories where she has ever been
4 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
5 provide information regarding the status of each license and any changes in such license status
6 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
7 new nursing license during the term of probation.

8 5. **Submit Written Reports.** Respondent, during the period of probation,
9 shall submit or cause to be submitted such written reports/declarations and verification of actions
10 under penalty of perjury, as required by the Board. These reports/declarations shall contain
11 statements relative to Respondent's compliance with all the conditions of the Board's Probation
12 Program. Respondent shall immediately execute all release of information forms as may be
13 required by the Board or its representatives.

14 Respondent shall provide a copy of this Decision to the nursing regulatory agency
15 in every state and territory in which she has a registered nurse license.

16 6. **Function as a Registered Nurse.** Respondent, during the period of
17 probation, shall engage in the practice of registered nursing in California for a minimum of 24
18 hours per week for 6 consecutive months or as determined by the Board.

19 For purposes of compliance with the section, "engage in the practice of registered
20 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
21 work in any non-direct patient care position that requires licensure as a registered nurse.

22 The Board may require that advanced practice nurses engage in advanced practice
23 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the
24 Board.

25 If Respondent has not complied with this condition during the probationary term,
26 and Respondent has presented sufficient documentation of her good faith efforts to comply with
27 this condition, and if no other conditions have been violated, the Board, in its discretion, may
28 grant an extension of Respondent's probation period up to one year without further hearing in

1 order to comply with this condition. During the one year extension, all original conditions of
2 probation shall apply.

3 **7. Employment Approval and Reporting Requirements.** Respondent
4 shall obtain prior approval from the Board before commencing or continuing any employment,
5 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
6 performance evaluations and other employment related reports as a registered nurse upon request
7 of the Board.

8 Respondent shall provide a copy of this Decision to her employer and immediate
9 supervisors prior to commencement of any nursing or other health care related employment.

10 In addition to the above, Respondent shall notify the Board in writing within
11 seventy-two (72) hours after she obtains any nursing or other health care related employment.
12 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
13 terminated or separated, regardless of cause, from any nursing, or other health care related
14 employment with a full explanation of the circumstances surrounding the termination or
15 separation.

16 **8. Supervision.** Respondent shall obtain prior approval from the Board
17 regarding Respondent's level of supervision and/or collaboration before commencing or
18 continuing any employment as a registered nurse, or education and training that includes patient
19 care.

20 Respondent shall practice only under the direct supervision of a registered nurse
21 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
22 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
23 are approved.

24 Respondent's level of supervision and/or collaboration may include, but is not
25 limited to the following:

26 (a) Maximum - The individual providing supervision and/or collaboration is
27 present in the patient care area or in any other work setting at all times.

28 ///

1 (b) Moderate - The individual providing supervision and/or collaboration is in
2 the patient care unit or in any other work setting at least half the hours Respondent works.

3 (c) Minimum - The individual providing supervision and/or collaboration has
4 person-to-person communication with Respondent at least twice during each shift worked.

5 (d) Home Health Care - If Respondent is approved to work in the home health
6 care setting, the individual providing supervision and/or collaboration shall have person-to-
7 person communication with Respondent as required by the Board each work day. Respondent
8 shall maintain telephone or other telecommunication contact with the individual providing
9 supervision and/or collaboration as required by the Board during each work day. The individual
10 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
11 site visits to patients' homes visited by Respondent with or without Respondent present.

12 9. **Employment Limitations.** Respondent shall not work for a nurse's
13 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a
14 traveling nurse, or for an in-house nursing pool.

15 Respondent shall not work for a licensed home health agency as a visiting nurse
16 unless the registered nursing supervision and other protections for home visits have been
17 approved by the Board. Respondent shall not work in any other registered nursing occupation
18 where home visits are required.

19 Respondent shall not work in any health care setting as a supervisor of registered
20 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
21 nurses and/or unlicensed assistive personnel on a case-by-case basis.

22 Respondent shall not work as a faculty member in an approved school of nursing
23 or as an instructor in a Board approved continuing education program.

24 Respondent shall work only on a regularly assigned, identified and predetermined
25 worksite(s) and shall not work in a float capacity.

26 If Respondent is working or intends to work in excess of 40 hours per week, the
27 Board may request documentation to determine whether there should be restrictions on the hours
28 of work.

1 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
2 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later
3 than six months prior to the end of her probationary term.

4 Respondent shall obtain prior approval from the Board before enrolling in the
5 course(s). Respondent shall submit to the Board the original transcripts or certificates of
6 completion for the above required course(s). The Board shall return the original documents to
7 Respondent after photocopying them for its records.

8 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
9 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
10 amount of \$2,358.00. Respondent shall be permitted to pay these costs in a payment plan
11 approved by the Board, with payments to be completed no later than three months prior to the
12 end of the probation term.

13 If Respondent has not complied with this condition during the probationary term,
14 and Respondent has presented sufficient documentation of her good faith efforts to comply with
15 this condition, and if no other conditions have been violated, the Board, in its discretion, may
16 grant an extension of Respondent's probation period up to one year without further hearing in
17 order to comply with this condition. During the one year extension, all original conditions of
18 probation will apply.

19 12. **Violation of Probation.** If Respondent violates the conditions of her
20 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
21 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's
22 license.

23 If during the period of probation, an accusation or petition to revoke probation has
24 been filed against Respondent's license or the Attorney General's Office has been requested to
25 prepare an accusation or petition to revoke probation against Respondent's license, the
26 probationary period shall automatically be extended and shall not expire until the accusation or
27 petition has been acted upon by the Board.

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1 13. **License Surrender.** During Respondent's term of probation, if she ceases
2 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
3 probation, Respondent may surrender her license to the Board. The Board reserves the right to
4 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
5 take any other action deemed appropriate and reasonable under the circumstances, without
6 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
7 will no longer be subject to the conditions of probation.

8 Surrender of Respondent's license shall be considered a disciplinary action and
9 shall become a part of Respondent's license history with the Board. A registered nurse whose
10 license has been surrendered may petition the Board for reinstatement no sooner than the
11 following minimum periods from the effective date of the disciplinary decision:

12 (1) Two years for reinstatement of a license that was surrendered for any
13 reason other than a mental or physical illness; or

14 (2) One year for a license surrendered for a mental or physical illness.

15 ACCEPTANCE

16 I have carefully read the above Stipulated Settlement and Disciplinary Order and
17 have fully discussed it with my attorney, Marc R. Greenberg. I understand the stipulation and the
18 effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and
19 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
20 Decision and Order of the Board of Registered Nursing.

21 DATED: 9/17/07

22

23

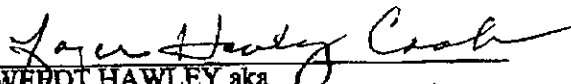
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28 ///


JOYCE TWERDT HAWLEY aka
JOYCE HAWLEY COOK
Respondent

1 I have read and fully discussed with Respondent Joyce Tweedt Hawley aka Joyce
2 Hawley Cook the terms and conditions and other matters contained in the above Stipulated
3 Settlement and Disciplinary Order. I approve its form and content.

4 DATED: Oct 10, 2007

5
6 
7 MARC R. GREENBERG
8 Attorney for Respondent

9 ENDORSEMENT

10 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
11 submitted for consideration by the Board of Registered Nursing of the Department of Consumer
12 Affairs.

13
14 DATED: Nov. 8, 2007

15 EDMUND G. BROWN JR., Attorney General
16 of the State of California

17 JAMES LEDAKIS
18 Supervising Deputy Attorney General

19 
20 RITA M. LANE
21 Deputy Attorney General

22 Attorneys for Complainant
23
24
25

Exhibit A
Accusation No. 2007-304

1 EDMUND G. BROWN, JR., Attorney General
of the State of California

2 MARGARET A. LAFKO

Supervising Deputy Attorney General

3 RITA M. LANE, State Bar No. 171352

Deputy Attorney General

4 California Department of Justice

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7 Telephone: (619) 645-2614

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8 Attorneys for Complainant

10 **BEFORE THE**
11 **BOARD OF REGISTERED NURSING**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

Case No. 2007-304

14 JOYCE TWEEDT HAWLEY a.k.a.

JOYCE HAWLEY COOK

15 1137 Vantage Place

Fallbrook, CA 92028

16 Registered Nursing License No. 523140

17 Respondent.

A C C U S A T I O N

19
20 Complainant alleges:

21 **PARTIES**

22 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation
23 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
24 Department of Consumer Affairs.

25 2. On or about July 3, 1996, the Board of Registered Nursing issued
26 Registered Nursing License Number 523140 to Joyce Tweedt Hawley a.k.a. Joyce Hawley Cook
27 (Respondent). The Registered Nursing License was in full force and effect at all times relevant
28 to the charges brought herein and will expire on November 30, 2007, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 118, subdivision (b), of the Business and Professions Code ("Code") provides that the suspension, expiration, surrender or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

5. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

6. Section 482 of the Code states:

Each board under the provisions of this code shall develop criteria to evaluate the rehabilitation of a person when:

- (a) Considering the denial of a license by the board under Section 480; or
- (b) Considering suspension or revocation of a license under Section 490.

Each board shall take into account all competent evidence of rehabilitation furnished by the applicant or licensee.

7. Section 490 of the Code states:

A board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action which a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

8. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a

1 person who holds a license, upon the ground that the applicant or the licensee has
2 been convicted of a crime substantially related to the qualifications, functions, and
3 duties of the licensee in question, the record of conviction of the crime shall be
4 conclusive evidence of the fact that the conviction occurred, but only of that fact,
5 and the board may inquire into the circumstances surrounding the commission of
6 the crime in order to fix the degree of discipline or to determine if the conviction
7 is substantially related to the qualifications, functions, and duties of the licensee in
8 question.

9 As used in this section, "license" includes "certificate," "permit,"
10 "authority," and "registration."

11 9. Section 2761 of the Code states:

12 The board may take disciplinary action against a certified or licensed nurse
13 or deny an application for a certificate or license for any of the following:

14 (a) Unprofessional conduct, which includes, but is not limited to, the
15 following:

16

17 (f) Conviction of a felony or of any offense substantially related to the
18 qualifications, functions, and duties of a registered nurse, in which event the
19 record of the conviction shall be conclusive evidence thereof.

20 10. Section 2764 of the Code provides, in pertinent part, that the expiration of
21 a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
22 against the licensee or to render a decision imposing discipline on the license.

23 11. California Code of Regulations, title 16, section 1444, states:

24 A conviction or act shall be considered to be substantially related to the
25 qualifications, functions or duties of a registered nurse if to a substantial degree it
26 evidences the present or potential unfitness of a registered nurse to practice in a
27 manner consistent with the public health, safety, or welfare. Such convictions or
28 acts shall include but not be limited to the following:

. . . .

(c) Theft, dishonesty, fraud, or deceit.

FIRST CAUSE FOR DISCIPLINE

(September 9, 1999 Conviction-Embezzlement of Federal Funds 1994-1997)

12. Respondent is subject to disciplinary action under Code section 2761(a) on
the grounds of unprofessional conduct as defined in section 2761(f) of that Code in that
Respondent was convicted of a felony involving the embezzlement of federal funds as described
in subdivisions (a), (b) and (c) of this section. The circumstances are as follows:

1 a. On or about September 9, 1999, in the United States District Court,
2 Western District of Washington, in proceedings entitled *United States of America v.*
3 *Joyce Hawley Cook*, Case No. 2:99-CR-00436-MJP-ALL, Respondent pled guilty to
4 violating 18 U.S.C. section 641 (Embezzlement of Federal Funds), a felony.

5 b. On or about March 9, 2000, Respondent was sentenced to 18
6 months of custody in the United States Bureau of Prisons, ordered to pay \$122,920.00 in
7 restitution, ordered to pay a \$100 special assessment fee, and upon release from prison to
8 be placed on supervised probation for 3 years.

9 c. The facts and circumstances surrounding this offense concern the
10 Washington State Substance Abuse Coalition (WSSAC), a non-profit organization
11 located in Bellevue, Washington, which receives federal funds from the United States
12 Department of Health and Human Services. Between October 1992 and April 1997,
13 Respondent was employed as the Executive Director of WSSAC. Between March 14,
14 1996 and May 7, 1997, Respondent embezzled \$9,631.00 in federal funds from WSSAC
15 by issuing checks drawn on the WSSAC account and made payable to Respondent and
16 her creditors. Between 1993 and January 1998, Respondent also held a volunteer position
17 as treasurer for the Governor's Industrial Safety and Health Advisory Board (GISHAB),
18 which is a not-for-profit corporation organized to advise the Governor of the State of
19 Washington on matters of industrial safety and health. Between August 3, 1994 and
20 September 12, 1997, Respondent embezzled \$134,790.00 from GISHAB by issuing
21 checks drawn on the GISHAB account and made payable to Respondent and her
22 creditors. The total amount that Respondent embezzled from WSSAC and GISHAB was
23 \$144,422.00.

24 **SECOND CAUSE FOR DISCIPLINE**

25 **(Conviction of a Crime Substantially Related to the Duties of a Registered Nurse)**

26 13. Respondent is subject to disciplinary action under Code sections 490 and
27 2761(a) and California Code of Regulations, title 16, section 1444(c) in that Respondent was
28 convicted of a crime substantially related to the qualifications, functions and duties of a

1 registered nurse as set forth in paragraph 12 above, which is realleged and incorporated herein by
2 reference.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct)**

5 14. Respondent is subject to disciplinary action for unprofessional conduct
6 under section 2761(a) in that she embezzled \$144,422.00 from previous employers for which she
7 held a position of trust as set forth in paragraph 12 above, which is realleged and incorporated
8 herein by reference.

9 **PRAYER**

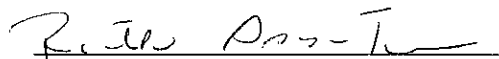
10 WHEREFORE, Complainant requests that a hearing be held on the matters herein
11 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

12 1. Revoking or suspending Registered Nursing Number 523140, issued to
13 Joyce Tweedt Hawley a.k.a. Joyce Hawley Cook;

14 2. Ordering Joyce Tweedt Hawley a.k.a. Joyce Hawley Cook to pay the
15 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this
16 case, pursuant to Business and Professions Code section 125.3; and

17 3. Taking such other and further action as deemed necessary and proper.
18

19 DATED: 6/15/07
20

21
22 
23 RUTH ANN TERRY, M.P.H., R.N.
24 Executive Officer
25 Board of Registered Nursing
26 Department of Consumer Affairs
27 State of California
28 Complainant